

FILED
JAMES BONINI
CLERK

05 NOV 30 PM 3:49

IN THE UNITED STATES DISTRICT COURT
FOR SOUTHERN DISTRICT OF OHIO, WESTERN
DIVISIONWilliam D. Reynolds, Col. USAF Ret.
7013 St. Rt. 221
Georgetown, Ohio 45121

Plaintiff Pro Se

vs,

Windell Crawford
7085 St Rt. 125
Georgetown, Ohio 45121

Defendant et.al.

Case No. C-1-01-877, removed from
Common Pleas Court, Brown County,
Ohio Case No. 20010713 by counsel
John E. Vincent.

Judge Weber

MOTION by Plaintiff for the Court

to reconsider its ORDER of 10/4/2005,
as shown below.FILED
JAMES BONINI
CLERK
05 DEC -8 PM 12:49

Now comes the Plaintiff who submitted his OBJECTIONS, file-stamped OCT 17 2005 to the Courts Order received by Plaintiff 10/4/2005 by Regular U.S. Mail and Certified Mail no. 7002 0860 0000 1408 9962. (Copy attached, with clarification(s) of Constitutional Violations shown below.)

(1) Sheriff Windell Crawford in his official capacity on 05-15-00 Denied Plaintiff Only, Equal Protection of the Laws in violation of U.S. Constitution, Amendment XIV, Section 1. (Copy attached EXHIBIT 5, previously filed with the Court that is self-evident of violation by REFUSING to send Officer for violation of ORC Chapter 3767 as can be heard on Tape Recording 10/11/2000.)

(2) Andrea Snider, Communications Center dispatcher on 05-15-00, wrote EXHIBIT 5 as dictated by Sheriff Windell Crawford, in his official capacity, and posted same in the communications center for all dispatchers on each shift to adhere to.

(a) Andera Snider FAILED to question the legality of Sheriff Crawford's EXHIBIT 1 and to the best of Plaintiff's knowledge and belief it remained in effect until he was voted out of office in NOV 2000.

(1.)

(3) Rick Hainey, Corrections Officer on 10/11/2000 in concert with Geno aPhbar also a corrections officer and conducted an Illegal Search and Seizure of Plaintiff's person and personal belongings, a Totally and Permanently Disabled person, to stand on his tip-toes, while Hainey searched Plaintiff's pockets and tried to fondle his Penis while doing so, in violation of Policy.

Further, Rick Hainey violated Plaintiff's U.S. Constitution, Amendment VIII by FAILING to contact his supervisor to get Plaintiff's his medications, the minimum of which were inscribed upon his Caduceus with Cautions, hanging on a chain around his neck.

(3) Geno aPGar, Corrections Officer on 10/11/2000 in concert with Rick Hainey participated in the Illegal Search and Seizure of Plaintiff's person and personal belongings, a Totally and Permanently Disabled person, in concert with Rick Hainey participated in making Plaintiff stand on his tip-toes while Hainey searched Illegally searched Plaintiff's pockets in violation of Department Policy.

Further, BOTH Corrections Officers Rick Hainey and Geno aPHbar knew what the Charge Was as shown on BOOKING Card at 5:15AM, Offense-PeRS DOC, therefore, it is self-evident that Plaintiff was Illegally jailed on 10/11/2000 because the erroneous/illegal charge by Deputy Clark Gray wasn't filed until 2000 OCT 11 AM 9:30 in violation of Plaintiff's rights under the U.S. Constitution, Amendment(s) I, IV, V, VII, VIII, XIV, [t]hus without Charge from 5:15AM 10/11/2000 to 9:30AM, ELAPSED TIME 4 hours 15 minutes without charge(s) and STILL WRONG as evidenced in EXHIBIT(s) B and B-1 previously filed with this Court, and file-stamped, respectively, 2000 OCT 11 AM 9:13, 2001 APR 29 PM 1:32, and added 2001 FEB 14 AM 10:10 EXHIBIT A-1, JOURNAL ENTRY 790853 2nd para. reads at the hand of Judge Margaret A. Clark Brown County, Ohio Court, Quoted:

Upon motion of the state, and for good reason shown, the State is permitted to amend the complaint and the complaint is hereby amended to include the language that the Defendant William Reynolds, persisted in disorderly conduct after after reasonable warning or request to desist.

This matter shall be set for jury.

SO ORDERED

Margaret A. Clark
Judge, Brown County Court.

(4) Judge Margaret A. Clark as a sitting judge in the Brown County, Ohio Court, has as evidenced in EXHIBIT 1-A has taken it upon herself TO DICTATE TO THE PROSECUTOR'S OFFICE HOW THE CHARGES ARE TO READ, therefore, has made herself:

- a. Prosecuting Attorney, Brown County, Ohio.
- b. Judge, Brown County, Ohio, as she was Elected.
- c. Hangman/Hangmadam as Prosecuting Attorney, Judge Jury, wherein she FAILED to:
- d. Give Plaintiff his Day-in-Court, with JURY, as she ORDERED.

(5) Mary McMullen, Assistant Prosecuting Attorney, under Thomas F. Grennen, the Brown County, Ohio Prosecuting Attorney and therein Ms. McMullen's two pages of pure Bull-Shit and Plaintiff helps pay her salary, in parts reads, Quoted:

EXHIBIT B-1, previously filed with the Court, para.1:

Now comes the State of Ohio, by and through Assistant Prosecuting Attorney Mary McMullen, and moves this court, pursuant to Crim R.7(D), to amend the complaint in this case. Initially, the Defendant was charged with disorderly conduct, in violation of R.C.2917.11(A)(2), a misdemeanor of the fourth degree. As charged, the language of the complaint did not recite a misdemeanor of the fourth degree, only a minor misdemeanor. Upon oral motion to amend, the State was permitted to amend the charge of the fourth degree misdemeanor.

Para.2 reads, Quoted:

(3.)

Pursuant to Crim.R.7(D) the State now wishes to amend the disorderly conduct charge to a minor misdemeanor.as previously charged. Amendments to the complaint may be made at any time before,during or after a trial,in respect to any defect,imperfection,or obmission in form or substance,or of any variance with the evidence,provided no change is made in the name or identity of the crime charged,Crim.R.7(D).

The name or identity of the crime charged does not change,only the level of offense. The charge is based on the same set of facts and circumstances as originally pled. The Defendant would not be prejudiced by such amendment,in fact,the amendment would lessen the potential punishment upon conviction significantly.

For the foregoing reasons,the State respectfully requests that the court permit the amendment to a minor misdemeanor disorderly conduct.

Respectfully submitted,

Mary Mc.Mullen
Mary McMullen #0066589
Assistant Prosecuting Attorney
200 East Cherry Street
Georgetown,Ohio 45121
(937) 378-4151

(6) Plaintiff's assessment of **PURE BULL-SHIT** has to be recognized by this Federal Court as quoted on Page 3 no.(4) and (5),and further:

(a) Mary McMullen FAILED to use Judge Clark's EXHIBIT 1-A para.2 DICITATORIAL for how the Charge was to read,therefore,self-evident that Judge Clark was a party-of-the-first-part in the **PURE BULL-SHIT** Amendment.

(b) Neither Judge Clark or Mary McMullen ever heard of State v. Hoffman [Cite as State v.Hoffman (1979),57 Ohio St. 2d 129.]

(4.)

PERJURED, EXHIBIT B, as COMPLAINANT, coupled with the fact it was ERRONEOUS in Content.

(d) It is further self-evident that Judge Margaret A. Clark exerted HER MOST EXTREME, PREJUDICIAL BIAS toward Plaintiff as evidenced in EXHIBIT 1-A JOURNAL ENTRY no. 790853, file-stamped 2001 FEB 14 AM 10:10 and is confirmed in:

(e) EXHIBIT 1, previously filed with this Court, file-stamped 2001 APR 19 AM 9:17, JOURNAL ENTRY no. 810064 reads, Quoted:

This matter was before the Court for trial on violation of R.C. 2917.11. Upon consideration of the testimony and the evidence and upon Motion of the Defendant, pursuant to Crim.R. 29, and dismissed the case.

BULL-SHIT, as Defendant, Plaintiff, STOOD TRIAL, therefore, WAS ACQUITTED OF THE FALSIFIED and PERJURED CHARGE OF Disorderly Conduct under ORC 2917.11 (A) (2) [t]hus Judge Margaret A. Clark's JOURNAL ENTRY 810064 is FALSIFIED and PERJURED.

Plaintiff's copy of Crim. RULE 29 reads, Quoted: (A) Motion for judgement of acquittal.

The court on motion of defendant or its own motion, after the evidence on either side is closed, shall order the entry of a judgement of acquittal of one or more offenses charged in the indictment, information or complaint, if the evidence is insufficient to sustain a conviction of such offense or offenses. The court may not reserve ruling on a motion for judgement of acquittal made at the close of the state's case.

Nowhere, in EXHIBIT 1, previously filed with this Court, does Judge Margaret A. Clark state: Defendant William Reynolds was Acquitted at Trial or words to that effect, therefore she shall be invited to answer, why not??

Lastly, on 11/3/2005 in chambers, counsel John E. Vincent told Judge Herman J. Weber, and Plaintiff Quotes as nearly as possible: He was held for about five (5) hours and released on OR bond.

Here the question becomes two fold: Why wasn't Plaintiff issued a M/M Citation by Deputy(s), Snider in concert with Meyer, and Why was Plaintiff Arrested/Incarcerated without Legal Probable Cause Affidavit, on 10/11/2000??


Col. William D. Reynolds. Plaintiff
(937)378-4331

CERTIFICATION

Two Original Signed copies mailed to District Court for file-stamp and return of one copy to Plaintiff in the S.A.S.E., provided. One Copy mailed by regular U.S. Mail to counsels Vincent and Landes in Col's Ohio, on 11/25/2005

28/2005

WDR

BROWN COUNTY COURT

2001 FEB 14 AM 10:10

BROWN COUNTY COURT
GEORGETOWN, OHIO
DANNY L. PRIDE
CLERK
STATE OF OHIO,

BROWN COUNTY, OHIO

Case No. CRB 0001246

Plaintiff

JOURNAL ENTRY

Vs

William Reynolds
Defendant

Feb. 14, 2001

This matter was before the court on the Defendant's motion to dismiss. Upon consideration of the testimony and evidence the court overruled the motion to dismiss.

Upon motion of the state, and for good cause shown, the state is permitted to amend the complaint and the complaint is hereby amended to include the language that the Defendant, William Reynolds, persisted in disorderly conduct after reasonable warning or request to desist.

This matter shall be set for jury.

SO ORDERED

Mary McMullen
A.A.# 0060589

Margaret A. Clark
Judge, Brown County Court

CERTIFIED COPY
BROWN COUNTY COURT
BROWN COUNTY, OHIO
CLERK DANNY L. PRIDE

AGENT: [Signature]
DATE: 11/25/02

790853

Per 41, IP Bill Reynolds

Calls on barking dogs, take

All the information and tell
him you will pass it on to
the dog warden. Do not

Send officer!!! 05-15-00

A. Smith

